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*Counsel for Evgeny A. Freidman, et al.*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re:

MOTORS LIQUIDATION COMPANY, *et al.*,  
f/k/a General Motors Corp., *et al.*,,  
Debtors.

**Chapter 11**

Case No. 09-50026 (REG)  
(Jointly Administered)

**VERIFIED STATEMENT OF MCKENNA LONG & ALDRIDGE LLP  
PURSUANT TO FEDERAL RULE OF BANKRUPTCY PROCEDURE 2019**

McKenna Long & Aldridge LLP (“MLA”), counsel for (i) Evgeny A. Freidman (having a business address at 313 Tenth Avenue, New York, New York 10001) and the plaintiffs in the action entitled *Freidman v. General Motors Corp., et al.*, S.D.N.Y. Docket No. 08 Civ. 2458 (SAS) (collectively with Evgeny A. Freidman, “Freidman”); and (ii) Industry Canada, 235 Queen Street, Ottawa, ON K1A 0H5 CANADA do hereby make the following verified statement pursuant to Rule 2019 of the Federal Rules of Bankruptcy Procedure:

### **1. Nature and Amount of Claims and Interest**

Freidman is lead plaintiff in an action filed in the Southern District of New York against, among others, the Debtor. The action is entitled *Freidman v. General Motors Corp., et al.*, S.D.N.Y. Docket No. 08 Civ. 2458 (SAS). It alleges fraud and breach of warranty against the Debtor based on material misrepresentations made by the debtor regarding its promises to manufacture, retrofit and sell to Friedman certain Chevrolet Uplanders for use as handicap-accessible taxicabs in New York City in compliance with the specifications and requirements of the New York City Taxi & Limousine Commission. By Opinion and Order dated May 29, 2009, the Honorable Shira A. Scheindlin, U.S.D.J., dismissed Friedman's claims as against the Debtor. Friedman now seeks leave to modify the automatic stay pursuant to Section 362(a) of Title 11 of the United States Bankruptcy Code and Rule 4001 of the Federal Rules of Bankruptcy Procedure to enable Friedman to proceed with the appeal of the May 29, 2009 Opinion and Order.

Industry Canada is a department of the Government of Canada which participated, with many other parties, in the restructuring, financing and sale of assets, including the ownership of General Motors of Canada Limited, by the Debtor to General Motors Company (now General Motors LLC).

MLA reserves the right to revise and supplement these statements, including in particular as to the nature and amount of claims and interests held by Friedman and Industry Canada.

### **2. Facts And Circumstances Of Counsel's Engagement**

Industry Canada and Friedman have separately retained MLA to represent their respective interests in connection with these matters.

**3. Claims Or Interests Of Counsel**

Upon information and belief formed after due inquiry, MLA does not hold any claims against or interests in Motors Liquidation Corporation (formerly known as General Motors Corporation) or any of its affiliated debtors and debtors in possession.

Dated: New York, New York  
October 30, 2009

MCKENNA LONG & ALDRIDGE LLP

By: \_\_\_\_\_ s/  
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*Counsel for Evgeny A. Friedman and plaintiffs in  
the action entitled Friedman v. General Motors  
Corp., et al., S.D.N.Y. Docket No. 08 Civ. 2458  
(SAS)*